



Cindy Cox

AT&T South Carolina
1600 Williams Street
Suite 5470
Columbia, SC 29201

T: 803.401.2252
F: 803.771.4680
cc2283@att.com
www.att.com

September 3, 2014

Ms. Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29211

Re: Submission of Form 481

Dear Ms. Boyd:

Attached for your files is a copy of a letter to the FCC explaining that two attachments were inadvertently omitted from the 2014 FCC Forms 481 – Carrier Annual Reporting Data Collection form that we recently submitted and providing copies of the omitted attachments.

Sincerely,

cc: Nanette Edwards, ORS (via email)



Anisa A. Latif
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.,
Suite 1000
Washington, D.C. 20036

202.457.3068 Phone
202.457.3071 Fax
al7161@att.com E-mail

August 18, 2014

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

RE: **ERRATUM - FCC Form 481 – Carrier Annual Reporting Data Collection
Form (Sections 54.313 and 54.422 Annual Reporting)**
WC Docket Nos. 10-90; 11-42

Dear Ms. Dortch:

AT&T Services, Inc., on behalf of certain wireline affiliates (collectively, AT&T),¹ hereby submits two attachments to these affiliates' 2014 FCC Forms 481 – Carrier Annual Reporting Data Collection Form, which were originally filed with the Commission on June 27, 2014 via the Electronic Comment Filing System. AT&T recently learned that two attachments were inadvertently omitted from its Commission filings due to a system error. AT&T certified and submitted complete FCC Form 481 filings to USAC on June 26, 2014; however, the printed copies of those complete filings generated by USAC's E-file system omitted the following attachments: description of compliance with Service Quality and Consumer Protection (Line 510) and description of Functionality in Emergency Situations (Line 610). AT&T provides those attachments here. I apologize for any inconvenience this may have caused.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachments

¹ Study Area Codes 255181, 405211, 545170, 549004, 135200, 215191, 225192, 415214, 265182, 275183, 285184, 555173, 235193, 245194, and 295185

Line 510 – Description of Compliance with Service Quality and Consumer Protection

AT&T has established methods and procedures that are designed to facilitate compliance with applicable service quality standards and consumer protection rules. In the event that a service quality or consumer protection issue arises, AT&T works with appropriate government entities and/or customers to resolve the issue consistent with AT&T's obligations.

AT&T has implemented Customer Proprietary Network Information and Truth-in-Billing procedures in accordance with the Commission's requirements. AT&T also makes available the rates, terms and conditions of its service offerings through service guides, guidebooks and, where applicable, tariffs, which consumers can access through AT&T's website (*available at <http://www.att.com/gen/public-affairs?pid=11970>*). Among other things, these documents clearly explain the terms of service, including dispute resolution procedures and billing and payment requirements. Consumers are able to contact AT&T with questions or concerns through a toll-free number or online. Also, AT&T advertises its services using media of general distribution and these advertisements are clear and contain appropriate disclosures. Lastly, AT&T has a company-wide privacy policy that describes how AT&T collects, uses and protects its customer's information (*available at http://www.att.com/Common/about_us/privacy_policy/print_policy.html*).

Line 610 – Descriptive Document for Functionality in Emergency Situations

Section 54.313(a)(6) of the Commission's rules requires an ETC to certify an ability to function in emergency situations as set forth in section 54.202(a)(2) of the Commission's rules. The standards set forth in section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities and a capability to manage traffic spikes resulting from emergency situations.

All AT&T ILEC central offices are equipped with battery backup equipment. Offices with dedicated standby generators are equipped with sufficient battery capacity to run for approximately four hours without power; offices with access to portable generators have sufficient battery capacity to operate for approximately eight hours without power. The fuel tanks supporting the standby generators are sized to supply enough fuel for approximately 72 hours runtime at three-quarters full fuel capacity, for the continuous operation of the engine alternator set at 100% (full) load.

Each AT&T network (voice [long-distance, local] IP, frame, ATM, etc.) is managed by a centralized network reliability center that manages and controls the network's operation. Network reliability centers are located throughout the United States. Network reliability centers are responsible for 1) Proactive 7x24 surveillance of network elements (fault management), 2) Progress & Event Notification to Customer Care Centers 3) Asset Management (including Spare Equipment Availability) 4) Logical Configuration Management, 5) Network Upgrades and Change Management and 6) Directing the Maintenance Activities of Business Partners (including the network field operations force and capacity management). Overseeing the network reliability centers and the hub of AT&T's overall network operations is the Global Network Operations Center, located in Bedminster, NJ. This center is staffed 24X7 and is constructed in a hardened facility. The GNOC staff monitors and proactively manages the data and voice traffic flowing across AT&T's domestic and global networks twenty-four hours a day, seven days a week. From their workstations on the GNOC floor, they can quickly survey a sweeping wall of 141 giant screens showing different aspects of network activity, network topography and news events. At their consoles, each team member monitors a different segment or technology in the network using the most advanced diagnostic and management tools available.

Planning for and responding to external crises is something that AT&T performs without hesitation. AT&T has a team of experts trained in working all types of situations around the world. We practice this response several times per year. AT&T has run and managed some of the world's largest and most complex networks for over 120 years. AT&T understands network reliability and disaster planning.

Not only do we practice in a "real life situation," but we invite our clients and customers to observe what we have and what we can bring to bear to restore the AT&T network. We have

extensive experience in planning for and responding to a wide variety of situations, from hurricanes to floods, to power outages and man-made disasters. We have a team of experienced Disaster Recovery First (DRF) responders that work to restore the AT&T network as quickly and safely as possible.

- ☐ Our Business Continuity Team has extensive experience in planning for and responding to a wide variety of situations that can affect the AT&T network. Our plans are designed to get the network back to a Business As Usual (BAU) state as quickly and safely as possible. The planning process includes incorporating improvement opportunities from previous events into future response activities.
- ☐ The AT&T Global Network Operation Center (GNOC) 3P (Preventive, Predictive, Pro-Active) Process collects, identifies, and evaluates the consolidated network view of any high-risk network vulnerabilities in a particular area to determine if there is a need to develop a mitigation response plan for the network.
 - ☐ This process is used for such events as National Special Security Events (NSSEs), political conventions, the Olympics, high profile sporting events, and hurricane/storm preparations.
 - ☐ The mitigation plan is developed to reduce the customer service disruption and to minimize network service affecting incidents with the activation of a managed restoration plan.
 - ☐ In addition to ensuring a response plan for any adverse events, the team also reviews and addresses issues such as capacity, infrastructure, and physical reliability.
- ☐ The AT&T Information Technology Service Continuity (ITSC) Program (ITSC) is committed to identifying and managing IT-related service continuity risks across the enterprise. The organization has established safeguards to minimize the risk, cost, and duration of disruption to essential business processes in the event of a major crisis or disaster. Accordingly, ITSC has taken a number of steps to ensure reliability of AT&T critical business processes and supporting infrastructures in order to provide high-quality communication services to AT&T customers. This includes up-front prevention and mitigation efforts, as well as comprehensive emergency response and recovery plans in the event of a disaster or crisis for three process areas:
 - ☐ IT Business Continuity - development, maintenance, and emergency procedures consistent with industry best practices.
 - ☐ IT Disaster Recovery - planning, testing and actual recovery of IT critical infrastructure and applications.
 - ☐ IT Crisis Center (ITCC) - management of processes, procedures, resources, and teams in response to disasters including:
 - ☐ Coordination with customer network recovery teams
 - ☐ Compliance with local government, national agencies and Code of Federal Regulations (CFR) 47, which governs telecommunication restoration efforts

Based on the foregoing, the reporting carrier certifies it is able to function in emergency situations as set forth in section 54.202(a)(2).